## UNITED STATES DISTRICT COURT DISTRICT COURT OF NEW MEXICO

MARGARET J. LOPEZ,	§	
individually and on behalf of all	§	
others similarly situated;	§	
	§	<b>CAUSE NO. 1:16-cv-01257-RB-KBM</b>
Plaintiff,	§	
	§	
vs.	§	
	§	
EL MIRADOR,	§	
INCORPORATED and LOUIS	§	
PEREA	§	
	§	
Defendants.	§	

## **MEMORANDUM OF AUTHORITIES**

## MAY IT PLEASE THE COURT:

Plaintiff propounded Interrogatories and Request for Production of Documents to Defendants. Defendants have responded. Plaintiff contends that Defendants' responses are insufficient in several respects. The parties continue to meet and confer regarding the contested discovery responses in an effort to resolve all issues without court intervention. Further, the parties continue to negotiate the terms and conditions of their Stipulation to Plaintiff's Motion for Conditional Certification and the form and content of notice. Resolution of these issues will have a material impact on the contested discovery responses.

Accordingly, Plaintiff respectfully submits that good cause exists for an extension of Plaintiff's deadlines to file her motion to compel Defendants' responses to discovery

pursuant to D.N.M. LR-26.6. Plaintiff has requested, and Defendants have agreed, to the following deadline for Plaintiff to file her Motions To Compel:

As to Defendant, El Mirador, Incorporated's

Objections to Plaintiff's Interrogatories July 21, 2017

Louis Perea Answers to Interrogatories July 21, 2017

El Mirador, Incorporated Response to Request

For Production of Documents August 25, 2017

Louis Perea Response to Request for

Production of Documents August 25, 2017

Undersigned counsel hereby certifies that Counsel for Defendants does not oppose this Motion.

Dated: May 25, 2017 Respectfully Submitted:

By: /s/Philip Bohrer

Philip Bohrer

phil@bohrerbrady.com

Scott E. Brady

scott@bohrerbrady.com

BOHRER BRADY, LLC

8712 Jefferson Highway, Suite B Baton Rouge, Louisiana 70809

Telephone: (225) 925-5297 Facsimile: (225) 231-7000

-and-

Brian L. Kinsley

blkinsley@crumleyroberts.com

CRUMLEY ROBERTS, LLP 2400 Freeman Hill Road

Greensboro, NC 27406

Telephone: (866) 336-4547 Facsimile: (336) 333-9894

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2017, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send notice of electronic filing to all counsel registered in this case. Any counsel not registered for electronic notice of filing with the Clerk of Court will be mailed a copy of the above and foregoing, First Class U.S. Mail, postage prepaid and properly addressed.

/s/ Philip Bohrer	
Philip Bohrer	